

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

IN THE MATTER OF:

Koppers Industries, Inc.	:	
City of Monessen	:	Solid Waste Management Act
Westmoreland County	:	
Docket No. 5-98145	:	

CONSENT ASSESSMENT OF CIVIL PENALTY

This Consent Assessment of Civil Penalty ("CACP") is entered into this 6th day of October, 1998, by and between the Commonwealth of Pennsylvania, Department of Environmental Protection ("Department") and Koppers Industries, Inc. ("KII"). The Department has found and determined the following:

A. The Department is the agency with the duty and authority to administer and enforce the Solid Waste Management Act, the Act of July 7, 1980, P.L. 380, *as amended*, 35 P.S. §§ 6018.101-6018.1003 ("SWMA") and the rules and regulations promulgated thereunder.

B. KII is a Pennsylvania corporation which maintains a business address of 436 Seventh Avenue, Pittsburgh, PA 15219-1800. KII operates a coke plant in Monessen, Pennsylvania ("Plant"). KII generates hazardous waste at the Plant and has been assigned I.D. No. PAD982577082.

C. On February 18, 1998, the Department conducted an inspection of the Plant. Immediately prior to and during the February 18, 1998 inspection, the Monessen area and the Plant experienced periods of heavy precipitation.

D. As a result of its February 18, 1998 inspection, the Department determined the following:

1. KII caused or allowed a blue-colored sludge which was later identified to be a residual waste to be dumped or deposited onto the surface of the ground in the vicinity of the east wall of Ore Yard No. 3 at the Plant, in violation of Sections 301 and 610(1) and (4) of the SWMA, 35 P.S. §§ 6018.301 and 6018.610(1) and (4).
2. KII caused or allowed residual waste generated by the Columnar Oxidation Plant (“Colox Sludge”) to be deposited onto the surface of the ground outside of its storage area and onto an adjacent access road at the plant, in violation of 25 Pa. Code §§ 299.111(4) and 299.131(a), and Sections 301, 302 and 610(1) and (4) of the Pennsylvania SWMA, 35 P.S. §§ 6018.301 and 6018.610(1) and (4).
3. KII normally handles Colox Sludge generated at the Plant under the provisions of 25 Pa. Code § 287.102(b), relating to captive residual waste permit-by-rule facilities. During the February 18, 1998 inspection and because Colox Sludge was not being managed in accordance with 25 Pa. Code §§ 299.111(4) and 299.131(a), KII processed Colox Sludge at the Plant without first obtaining a permit from the Department, in violation of Sections 301, 302(a) and 610(2) and (4) of the SWMA, 35 P.S. §§ 6018.301, 6018.302(a), 6018.610(2) and (4).

4. KII caused or allowed precipitation to accumulate in the containment area used for the storage of coal tar decanter sludge (K087) at the Plant, in violation of 25 Pa. Code §§ 264.175(a)(2) and (c) and Sections 401(a), 403(a) and (b)(9), and 610(2) and (4) of the SWMA, 35 P.S. §§ 6018.401(a), 6018.403(a) and (b)(9), and 6018.610(2) and (4).

E. The violations described in Paragraph D constitute unlawful conduct under Section 610 of the SWMA, 35 P.S. § 6018.610; and subject KII to a claim for civil penalties under Section 605 of the SWMA, 35 P.S. § 6018.605.

After full and complete negotiation of all matters set forth in this CACP and upon mutual exchange of the covenants herein, the parties desiring to avoid litigation and intending to be legally bound, it is hereby ASSESSED by the Department and AGREED to by KII as follows:

1. **Assessment.** In resolution of the Department's claim for civil penalties, which the Department is authorized to pursue under Section 605 of the SWMA, 35 P.S. § 6018.605, the Department hereby assesses a civil penalty of SEVEN THOUSAND FIVE HUNDRED DOLLARS (\$7,500.00), which KII hereby agrees to pay.

2. **Civil Penalty Assessment.** Upon signing this CACP, KII shall pay the civil penalty assessed in Paragraph 1. This payment is in settlement of the Department's claim for civil penalties for the violations and date set forth in Paragraph D, above. The payment shall be by corporate check or the like, made payable to "Commonwealth of Pennsylvania, Solid Waste Abatement Fund" and sent to Anthony D. Orlando, Regional Manager, Waste Management, Pennsylvania Department of Environmental Protection, 400 Waterfront Drive, Pittsburgh, PA 15222-4745.

3. **Findings.**

(a) KII agrees that the findings in Paragraphs A through D are true and correct and, in any matter or proceeding involving KII and the Department, KII shall not challenge the accuracy or validity of these findings.

(b) The parties do not authorize any other persons to use the findings in this CACP in any matter or proceeding.

4. **Reservation of Rights.** The Department reserves all other rights with respect to any matter addressed by this CACP, including the right to require abatement of any conditions resulting from the events described in the Findings. KII reserves the right to challenge any action which the Department may take, but waives the right to challenge the content or validity of this CACP.

IN WITNESS WHEREOF, the parties have caused this CACP to be executed by their duly authorized representatives. The undersigned representatives of KII certify, under penalty of law, as provided by 18 PA C.S. § 4904, that they are authorized to execute this CACP on behalf of KII; that KII consents to the entry of this CACP as an ASSESSMENT of the Department; that KII hereby knowingly waives any right to a hearing under the statutes referenced in this CACP; and that KII knowingly waives its right to appeal this CACP, which rights may be available under Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 530, No. 1988-94, 35 P.S. § 7514; the Administrative Agency Law, 2 Pa. C.S. § 103(a); and Chapters 5A and 7A, or any other provision of law.

FOR KOPPERS INDUSTRIES, INC.:



Name R. D. Collins

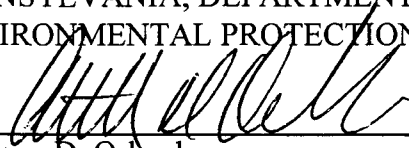
Vice President & Secretary

Title

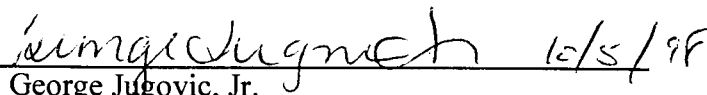


Name
Attorney for KII

FOR THE COMMONWEALTH OF
PENNSYLVANIA, DEPARTMENT OF
ENVIRONMENTAL PROTECTION:



Anthony D. Orlando
Regional Manager
Waste Management



George Jugovic, Jr.
Assistant Regional Counsel

ADO:SPW:jmt

**KOPPERS
INDUSTRIES**

Date: OCTOBER 01 1998

328532 ⁶²⁻⁴₃₁₁

Pay To The Order Of: PENNSYLVANIA COMMONWEALTH

Amount
\$7,500.00

SEVEN THOUSAND FIVE HUNDRED AND 00/100 ONLY

PENNSYLVANIA COMMONWEALTH
PADEP
400 WATERFRONT DR
PITTSBURGH PA 15222-4745Payable through Mellon Bank (DE) N.A., Wilmington, DE 19899
Mellon Bank (East) N.A., Philadelphia, PA 19102DE *[Signature]**mc [Signature]*KOPPERS INDUSTRIES, INC.
V.P. AND C.F.O. TREASURER

⑈ 3 2 8 5 3 2 ⑈ ⑆ 0 3 1 1 0 0 0 4 7 ⑆ 2 ⑈ 9 4 3 6 7 8 ⑈

10/1/98	Koppers Industries	0977849	328532	\$7,500.00		Civil Penalty Docket # 5-98145	001780035622104	FEU
DATE	NAME	RECEIPT NUMBER	CHECK NUMBER	AMOUNT PAID	TAX INCL.	ISSUED FOR	REVENUE ID	REF.

LOCAL OFFICE STAMP

DEPARTMENT OF ENVIRONMENTAL PROTECTION
SOUTHWEST REGIONAL OFFICE
400 WATERFRONT DRIVE
PITTSBURGH PA 15222 4745RECEIVED
FROMKoppers Industries
436 SEVENTH AVE
Pittsburgh PA 15219-1800

RECEIPT No. 0977849

DESCRIPTION

Civil Penalty

Docket # 5-98145

Koppers Industries

Westmoreland Cty / City of Monessen

COMMONWEALTH OF PENNSYLVANIA

BY:

Alara Wilson



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 2/6/99
Time Start 9:00 A.M.
Time Finish 3:00 P.M.

HAZARDOUS WASTE INSPECTION REPORT
☒ GENERATOR ☐ SQ GENERATOR

Company name KOPPERS INDUSTRIES INC. I.D. Number PA0982577082
Address 345 DOWNER AVENUE MONESSEN PA
County WESTMORELAND Municipality Monessen ZIP 15062
Name of Inspector GEORGE SABOCHECK GALE CAMPBELL (Section Chief)
Name & Title of Responsible Official JAMES BURKHART - PLANT MGR.
Person Interviewed GREG SHAMITKO Telephone (724) 684-1009
Mailing Address (if different from above) 430 SEVENTH AVENUE PITTSBURGH PA 15219
Amount of Hazardous Waste Generated per Month: LQ pounds _____ Kgs

1. Site Characterization:

STORAGE: ☒ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☒ Reclaim Other _____
General Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name DART TRK. License Number PA-AH-0219
Transporter Name SAFETY KLEEN License Number PA-AH 0172
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	WASTE DESCRIPTION <small>Destination Facility</small>	TSD Location and Type
K087	W/decanters sludge SOIL CONTAMINATED	LAIDLAW ENV. SERVICES LAUREL, MD (TSF)
D001/D039	SPENT SOLVENT BENZENE, CRESOL	SAFETY KLEEN (TSF)
D018/D026	CONTAMINATED SOIL Cleanup	Cyanogen Inc. (TSF)

5. Source Reduction: ☒ Accomplished ☒ Proposed ☐ Not Proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT GENERATORS -- SMALL QUANTITY GENERATORS

Site Name KOPPER S ID Number PAD 982577082 Date 2/6/99

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
X				Hazardous waste determination performed on all waste streams	262.11	H001
X				Identification Number	262.12	H002
X				Licensed transporters only	262.12(d)	H003
X				TSD Authorization received for wastes shipped within PA	262.13	H004
X				Proper manifest used	262.20	H005
X				Manifests filled out correctly and completely	262.20(g)	H006
X				Manifests routed properly and within time limits (7 days)	262.23	H007
				Shipping containers properly marked and labeled	262.30	H008
X				Generator waste accumulated on site for 90 days or less	262.34(a)	H009
	X			SQG waste accumulated on site for 180 days max unless 200 mile distance rule applies - 270 days	262.34(e) (f)	H010
	X			SQG waste accumulated on-site never exceeds 6000 kg	262.34(e)	H011
X				Satellite accumulation requirements complied with	262.34(c)	H012
X				Personnel training program per 265.16 complied with (Gen 262.34(a)(5); SQG 262.34(e))	262.34(a)(5) 262.34(e)	H013
X				Manifest and biennial reports retained for 3 years	262.40(a)(b)	H014
		X		Specified records retained for 20 years	262.40(c)(e)	
X				Biennial reports submitted to the Department - LQG	262.41	H015
	X			Exception reporting procedures followed	262.42	H016
		X		Spill reporting procedures followed	262.46	H017
X				PPC plan developed and implemented	262.46	H018
X				Special requirements followed for international shipments	262.50	H019
X				Source reduction strategy prepared and available - LQG	262.80	H020
X				Excluded WASTE complies w/ preliminary requirements	262.4	H021
				please check w/ TSF on final destination of waste.		

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Site Name KOPPER S ID Number PAD 982577082 Date 2/6/99

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1 2 3 4

				REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
	X			Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify content	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
	X			Special requirements for ignitable or reactive and incompatible waste complied with	265.176 265.177	H032
		X		Proper containment and collection systems in place	265.178(a)-(d)	H033
	X			All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
		X		Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H039
	X			Secondary containment provided for tanks (systems) as required	265.193	H040
	X			Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H041
	X			Tanks labeled to accurately identify contents	265.194(d)	H042
	X			Required inspections completed and documented in operating log	265.195	H043
	X			Release reported to Department within 24 hours, unless exempted	265.196	H044
	X			Special requirements for ignitable and reactive wastes followed	265.198	H045
	X			SQ Generator complies with 265.201	265.234	H046

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 2/6/99Identification Number PA0981577081Company/Facility/Site Name KOPPER'S

Narrative:

The Monaca Coke Plant is owned by KOPPER'S INDUSTRIES INC. (KII). The Plant's primary business is the manufacture of metallurgical grade coke for the steel industry. Coal tar is produced during the destructive distillation of coal. The tar is collected from the coke battery (consists of 2 batteries with 56 ovens) and transported through flushing liquor system. The tar is separated from the flushing liquor and gas at several locations. One location is the tar decanter. The tar is separated from the liquor. The sludge is collected independently of the tar and recycled back into the coke manufacturing process per 2CL4 - exclusionary requirements per K087.

- Ammonia gas from the ovens is reacted with sulfuric acid to form ammonium sulfate - sold as fertilizer.

An additional process has been installed whereby the dry sludge is processed thru the sewage meter and re-introduced into the manufacturing process (dry system).

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) [Signature]Date 2/6/99Inspector (signature) [Signature]Date 2/6/99

INSPECTION REPORT COMMENTS

Date of Inspection

2/6/99

Identification Number

PA0 98257082

Company/Facility/Site Name

Hazardous Waste Manifests were reviewed for 1998.

A complete plant tour was conducted.

The PPC Plan was revised June 1998.

The principal hazardous waste stream at the plant includes K087 Accretion Sludge and ~~sol~~ hazardous solvents.

K087 hazardous wastes are shipped to Hazardous Services in Laurel Md which is considered a TSF.

DO18 contaminated soil is sent to Cyanogor Inc in Detroit MI.

Peppers should be aware of the final destination of waste and the TSF's requirements for international shipments. Please respond to this comment by letter to the Monitoring Office of DEP.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person Interviewed (signature)

Date

2/6/99

Inspector (signature)

Date

2/6/99





COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

Inspection Date 15 April 1998
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR☐ S Q GENERATOR

Company name Koppers Industries, Inc. I.D. Number PAD982 577082
Site Address 345 Donner Avenue Monessen, PA
County Westmoreland Municipality Monessen ZIP 15062
Name of Inspector David Leiford, Howard Dunn
Name & Title of Responsible Official Tim Wojewicz
Person Interviewed Greg Shamitko; Nathan Prepelka Telephone (224) 684-1009
Mailing Address (if different from above) 436 Seventh Avenue Pittsburgh, PA 15219
Amount of Hazardous Waste Generated per Month: DC01 3060gals Pounds _____ Kgs _____
K087 45,646 lbs. (1997)

1. Site Characterization:

STORAGE: ☐ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☐ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name _____ License Number _____
Transporter Name _____ License Number _____
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
K087	soil contaminated with decanter tar sludge	Laidlaw Env. Service MD0980554 653 Laurel, MD 20724
DC01	ignitable spent solvent (parts washer)	Safety Klean Corp. PAD981 736143 Johnstown, PA 15104

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

**HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS**

Site Name Koppers Industries, Inc. ID Number PAD 982 577 082 Date 15 April 1998
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
X				Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
	X			Container storage areas inspected at least weekly	265.174	H031
	X			Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met	265.178(e)	H034
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
X				Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
	X			Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
X				Secondary containment provided for tanks (systems) as required	265.193	H041
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
X				Tanks labeled to accurately identify contents	265.194(d)	H043
X				Required inspections completed and documented in operating log	265.195	H044
X				Release reported to Department within 24 hours, unless exempted	265.196	H045
X				Special requirements for ignitable and reactive wastes followed	265.198	H046
X				SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 15 April 1998 Identification Number PAD 982 577 082

Company/Facility/Site Name Kopper Industries, Inc. Coke Plant

Follow-up inspection conducted with water quality specialist Howard Dunn to determine what corrective actions had been taken as a result of the violations noted on the 2/18/98 inspection and cited on the notice of violation letter dated 2/25/98.

The blue colored sludge material observed on the ground adjacent to the east wall of ore yard #3 has been cleaned up and placed into a 55 gallon drum container. Analysis shows the material is a hazardous waste by definition. It is however, high in cyanide content (2,650 mg/L - leachable cyanide) and will require proper disposal at a facility permitted to accept this waste.

Sludge from the columbic oxidation plant ("cobox") has been cleaned up from the access road along the river. The storage bins have been cleaned out and are now providing secondary containment for the container boxes used to store sludge drained from the three reactors. The two stage boxes measure 5 ft x 5 ft x 3 ft. Generally, two box loads of sludge are now being recycled onto the coal at the tar recycling station (former AKJ plant).

No records of cobox sludge generated will be required as long as the sludge is properly recycled without treatment, processing or being released into the environment.

The containment area for the storage of coal tar decanter sludge and other wastes recycled onto the coal (former AKJ plant area) was cleaned.

A system to remove accumulated precipitation and/or spilled or leaked wastes is now in place.

Weekly inspections of hazardous waste storage areas are not required if no hazardous is being generated or stored. Excluded wastes must be properly handled (ie not spilled onto the ground) for a waste to be excluded from being regulated as a waste.

All violations noted on 2/18/98 have been corrected.

This inspection report is notice of the findings of an inspection conducted by a representative of the Department. This report is formal notification of any violations observed during the inspection. Additional notification of violations may be issued concerning either violations noted herein, or other violations identified as a result of review of laboratory analyses or Department records.

This report does not constitute an order or other appealable action of the Department. Nothing contained herein shall be deemed to grant or imply immunity from legal action for any violation noted herein.

Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) Maileed

Date 18 May 1998

Inspector (signature) Daniel L. Leight

Date 18 May 1998



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

EPA

Inspection Date 18 Feb. 1998
Time Start _____
Time Finish _____

HAZARDOUS WASTE INSPECTION REPORT

☒ GENERATOR ☐ S Q GENERATOR

Company name Koppers Industries, Inc. I.D. Number PAD 982 577 082
Site Address 345 Donner Avenue Monessen, PA
County Westmoreland Municipality Monessen ZIP 15062
Name of Inspector David Leiford
Name & Title of Responsible Official Tim Wojewicz, general manager
Person Interviewed Gregory Shamitko, director of env. affairs Telephone (724) 684-1009
Mailing Address (if different from above) 436 Seventh Avenue Pittsburgh, PA 15219
Amount of Hazardous Waste Generated per Month: 0001 - 30-6000 lbs. Pounds _____ Kgs _____
K087 - 45,640 lbs. (1997)

1. Site Characterization:

STORAGE: ☐ Container ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad Other _____
PBR: ☐ Neutralization/WWTP ☒ Reclaim Other _____
Generator Treatment ☐ Containers ☐ Tanks ☐ Containment Bldg. ☐ Drip Pad

2. Universal Waste: ☐ Large Quantity Handler ☐ Small Quantity Handler

Universal Waste Types _____

3. Hazardous Waste Transporters:

Transporter Name Dart Trucking Co. Inc. License Number PA-AH 0219
Transporter Name Safety Kleen Corp. License Number PA-AH 0122
Transporter Name _____ License Number _____

4. Types of hazardous waste generated and destination facility (location & type).

Waste Code	Waste Description	Destination Facility
<u>K087</u>	<u>soil contaminated with decanter for sludge</u>	<u>Laidlaw Env. Service 800 930 5576</u>
<u>0001</u>	<u>ignitable spent solvent (parts washer)</u>	<u>Safety Kleen PAD 981 736 143</u>
		<u>Johnstown, PA 15704</u>

cc: Pittsburgh Regional File
EPA
Facility
Chron

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS -- SMALL QUANTITY GENERATORS
FACILITY SPECIFICS

Site Name Koppers Industries, Inc. ID Number PAD 982 577082 Date 18 Feb. 1998
1 - No Violation Observed 2 - Not Applicable 3 - Not Determined 4 - Non Compliance

STATUS

1	2	3	4	REQUIREMENT	CHAPTER CIT.	LINE
				CONTAINERS (Subchapter I)		
		X		Containers managed in compliance with Chapter 265 Subchapter I	262.34	H025
X				Containers of hazardous waste in good condition	265.171	H026
X				Containers and stored waste compatible	265.172	H027
X				Containers kept closed except during addition or removal of wastes	265.173	H028
X				Containers managed to prevent leaks	265.173(b)	H029
X				Containers labeled to accurately identify contents	265.173(c)	H030
		X		Container storage areas inspected at least weekly	265.174	H031
X				Special requirements for ignitable or reactive and incompatible waste complied with	265.176, 265.177	H032
X				Proper containment and collection systems in place	265.178(a)-(d)	H033
X				All storage requirements for ignitable or reactive wastes and nonignitable or nonreactive wastes met <i>(height and aisle space)</i>	265.178(e)	H034
				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(2)	H035
						H036
						H037
						H038
				TANKS (Subchapter J)		
	X			Tanks labeled "Hazardous Waste"	262.34(a)(4)	H039
		X		Written certification by registered professional engineer for proper tank (system) design and installation on file	265.192	H040
X				Secondary containment provided for tanks (systems) as required <i>(coal tar decanter sludge tank)</i>	265.193	H041
X				Tanks (systems) managed to prevent rupture, leak, corrode or fail	265.194	H042
X				Tanks labeled to accurately identify contents	265.194(d)	H043
	X			Required inspections completed and documented in operating log	265.195	H044
	X			Release reported to Department within 24 hours, unless exempted	265.196	H045
	X			Special requirements for ignitable and reactive wastes followed	265.198	H046
	X			SQ Generator complies with 265.201	262.34(e)(3)	H047

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 18 February 1998 Identification Number PAAD 982 577 082

Company/Facility/Site Name Koppers Industries, Inc. Coke Plant

Inspection of this facility conducted with Don Harey, air quality specialist and Greg Shamitko, director of environmental affairs for Koppers. This plant manufactures metallurgical coke. Other products from the coking process include tar, sulfur, light oils and ammonium sulfate. Hazardous wastes generated at this facility include soil contaminated with decanter tar sludge (KOS⁷) and ignitable spent solvent from parts cleaning. The Hazardous Waste Report for 1997 has been completed (2/17/98). No other hazardous wastes were identified. Two shipments of KOS⁷ were made during 1997. Spent solvent is recycled monthly, typically 35-66 gallons per month.

The process for recycling wastes back into the coking manufacture has been taken over by Koppers. The process was formerly run by A.K.J. The transfer of responsibilities may have contributed to the poor condition of the containment areas for the decanter tar tank and storage area for wastes at the tar recycle center. The containment area for the decanter tar tank had spilled tar inside it as well as accumulated rainwater. The containment area for wastes at the tar recycle center ~~also~~ held a large amount of rainwater. There was no system set up to remove spilled or leaked waste, or accumulated precipitation. These containment areas should be inspected weekly so that any maintenance or clean-up work necessary may be performed in a timely fashion. This will aid in preventing spilled wastes from being tracked onto the ground.

A blue colored sludge (approximately 3 ft x 3 ft) was observed spilled onto the ground next to the east wall of the ore yard #3. The origin of this material could not be determined. A split sample of the sludge was taken with Mr. Shamitko. This sludge should be cleaned up and properly contained until a complete waste determination is performed.

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Signature by the person interviewed does not necessarily imply concurrence with the findings on this report, but does acknowledge that the person was shown the report or that a copy was left with the person.

Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
BUREAU OF LAND RECYCLING AND WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 18 February 1998 Identification Number PAD 982577082

Company/Facility/Site Name Koppers Industries, Inc. Coke Plant

Although it's not a hazardous waste, sludge from the columnar oxidation plant that was reported to have been recycled onto the coal for its carbon content, was observed deposited onto the ground outside its storage area. The sludge was also observed to be washing off-site into the Monongahela River in the vicinity of outfall #001. The "celox" sludge was observed deposited onto the access road along the riverside of the plant for a distance estimated at 100 ft. The celox sludge should be cleaned up and proper storage maintained so that rainwater does not wash it outside of the storage/containment area. The residual waste inspection report from April 8, 1997 requested that a product determination or beneficial use determination be made for the "celox" sludge as specified in 25 PA Code Chapter 287.7. In addition, it was requested the volume of the sludge generated be totaled, as well as the carbon content be determined. These determinations have not been made.

A storage pile of off-specification ammonium sulfate was observed on the east (downriver) side of the plant. This material was reportedly sold for fertilizer. The ammonium sulfate did not appear clean. A split sample for analysis was also made of this material.

Annual training records for the facility were reviewed; Hazardous materials handling, confined space training, etc. is being conducted.

The preparedness, prevention and contingency plan has been updated. The material spilled next to the no. 2 battery (noted on 4/8/97 inspection) was analyzed on 5/28/97 and was determined to be non-hazardous.

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Person interviewed (signature) _____

Date _____

Inspector (signature) _____

Date 26 February 1998



COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 8 April 1992 Time start _____ Time finish _____
Name of Inspector David Leiford
Company, installation name Koppers Industries, Inc.
Location 345 Donner Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official ~~David Leiford~~ Tim Wojowicz
Title ~~Vice President~~ general manager
Mailing Address 436 Seventh Avenue Pittsburgh, PA 15219
Area code and telephone number (412) 227-2032
Name of person interviewed Gregory Shamitko
Title director of environmental affairs
Mailing address (if different from above) same
Area code and telephone number (412) 684-1009 (G. Shamitko)

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☒ Off-site ☐ use, ☐ reuse, ☐ recycle, ☒ reclaim

2. Amount of hazardous waste produced:

- a. K087 = 80 yd³ (1996) kg./mo.
b. DC01 = 70 gal/month kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
<u>K087 / D018</u>	<u>Laidlaw Environmental Services</u>	<u>Laurel, MD 20724 - land disposal</u>
<u>D001 / D006 / D018</u>	<u>MDD 980 554 653</u>	
<u>D001 / D006 / D018</u>	<u>Safety Kleen Corp.</u>	<u>Johnstown, PA 15904 - recycle</u>
	<u>PAD 981 736 143</u>	
<u>D002</u>	<u>Laidlaw Environmental Services</u>	<u>Laurel, MD 20724 - storage</u>
	<u>MDD 980 554 653</u>	

4. Source Reduction: ☒ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Koppers Industries, Inc. ID Number PAD 982 577 082 Date 8 April 1997

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
			X	Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
X				Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
X				PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
		X		Shipping containers marked and labeled according to U.S. DOT	262.30(2)	H010
X				Containers of 110 gal. or less permanently marked with required hazardous waste label	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
X				Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
X				Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
X				Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
X				h). Proper containment and collection system(s)	265.178	H023
	X			Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
			X	On the job or classroom personnel training program as per 265.16(e)	265.16(e)	H025

**Hazardous Waste Inspection Report
Generators - Part 8**

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Records retained at designated location for 20 years <i>3 years</i>	252.40(a)	H026
	X			Quarterly reports submitted to the Department	252.41(a)	H027
	X			Exception reporting procedures followed	252.42	H028
	X			Hazardous waste disposal plan, if required	252.45	H029
		X		Spill reporting procedures followed	252.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	252.46(e)	H031
	X			Special requirements followed for international shipments	252.50, .53, .55, .60	H032
X				Source reduction strategy prepared and available	252.80	H033

INSPECTION REPORT COMMENTS

This facility manufactures coke, tar, sulfur and light oils from coal. Inspection conducted with director of environmental affairs Greg Shamitko. The main hazardous wastes generated continue to be K082 coal tar, decanter sludge and parts washer fluid. K082 waste that is manifested off site is generated almost exclusively from cleanups during new construction activity. K082 generated from the new decanter is recycled with the coal. Containment around the decanter is being well maintained. The AKT plant contained four hoppers; two containing K082 sludge, one containing a liquid sludge from the bag plant / columbian oxidation plant, and one hopper of muck oil. There is no record of analysis of the muck oil. Although the muck oil is being recycled onto the coal for bulk density purposes, an analysis should be made of the oil. Containment area for the AKT plant was well maintained. Containment area for the ammonium sulfate sludge had a liquid accumulation (steam?). Containment area for the ammonia liquor storage tanks had a small accumulation of ammonia liquor (25 gallons) which had likely been leaked during repair work. Ammonia liquor is treated at the "color" plant. Ammonium sulfate sludge is generated at the rate of

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Person interviewed (signature) _____ Date _____
 Inspector (signature) _____ Date _____ *p. 3 of 4*

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 8 April 1997 Identification Number PAD 982577082Company/Facility/Site Name Koppers Industries, Inc.

approximately two 5 gallon buckets per shift. This material is also recycled onto the coal at the Akes plant.

A review of the training records found no annual review had been conducted. This should be accomplished per 265.16 (c). Additionally new employees should be trained within 6 months of their employment.

A review of the PPC plan found that the spill section needed to be updated (sulfuric acid, Feb 1996) and the list of emergency coordinators should be updated to include the assistant plant manager, Bob Ross.

Acetone usage within the plant could not be determined. If it is being used as stated in the PPC plan, how so?

All hazardous waste manifests reviewed for 1996 were found to be in order.

Material spilled next to the no. 2 battery (approximately 1/2 barrel, 55 gal. drum) should be analyzed. Color and smell (naphthalene) indicate it may be coke oven gas condensate dust. This should be cleaned up and properly disposed.

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Person interviewed (signature) [Signature]Date 8 April 1997Inspector (signature) [Signature]Date 8 April 1997

Department of Environmental Resources	GENERAL INSPECTION REPORT	Waste Management Field Operations
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Type of Inspection <i>Follow up</i>	WM Identification Number <i>PAF 982 577 082</i>	Entry Time/Date <i>1330 4 Jan. 1996</i>	Exit Time/Date <i>1530 4 Jan. 1996</i>
Facility/Incident Name and Location <i>Monessen, Inc.</i>		Municipality <i>Monessen</i>	
<i>345 Danner Ave. Monessen, PA 15062</i>		County <i>Westmoreland</i>	

Name, Address or Responsible Official <i>Sharon Steel Corp c/o Robert Trbovich</i>	Title <i>Vice president</i>
<i>Farrell, PA 16121</i>	Telephone <i>(412) 983-6336</i>
	DOB —
	Interviewed? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO
	SSN —

REMARKS *Inspection of drum storage areas with Lynn Shrautler, Westmoreland County Planning Commission and Mike Dvorsky, Earth Sciences Consultants. All drums have been removed and manifested off-site with the exception of two drums located at the wire mill storage site. These drums contain PCB-contaminated material (drum no. BM-67) and an unmarked overpack. It is anticipated approval for disposal of these two drums will be obtained in the next few weeks (Chevron facility). Mr. Dvorsky reported approximately 40 additional drums of various substances were added to the inventory of the drum storage area in the wire mill prior to manifestation. The source of the 40 drums has not been determined. Additionally, approximately 20 drums of hazardous grease are missing from the original inventory at the wire mill. Disposition of these drums is not known at this time.*

Storage areas at the blanning mill, open hearth, and B.D.F. were clean. A small spill of oil (?) onto the dirt floor of the Ingot Mold building should be excavated, analyzed, and manifested off-site according to the test results.

VIOLATIONS *none cited*

Sample Collected? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	Sample Numbers	Analyses
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Inspector Name <i>David Leiford</i>	Inspector Signature <i>David Leiford</i>	Headquarters <i>Greensburg, PA</i>	Date <i>4 Jan 1996</i>
Person Interviewed Name <i>Lynn Shrautler</i> <i>Mike Dvorsky</i>	Signature of Person Interviewed <i>[Signature]</i>	Title <i>Deputy Director, Env. Hearing</i> <i>W.E.D.C.</i> <i>Project Mgr. / ESC</i>	Telephone <i>(412) 725-5400</i>

This document is official notification that a representative of the Department of Environmental Resources inspected the above mentioned facility. The findings of the inspection are shown above and on any attached pages. Violations discovered as a result of this inspection are indicated. Violations may also be discovered upon examination of the results of laboratory analyses, review of pertinent documents and further investigation. Notification will be forthcoming if such violations are discovered.

cc: Pittsburgh Region
EPA
Facility

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART A

Date of Inspection 11 December 1995 Time start _____ Time finish _____
Name of Inspector David Leitford
Company, installation name Koppers Industries, Inc.
Location 345 Denney Ave. Monessen, PA 15062
County Westmoreland Municipality Monessen
Identification number PAD 982 577 082
Name of responsible official Donald Sweet
Title Vice president
Mailing Address 436 Seventh Avenue Pittsburgh, PA 15219
Area code and telephone number (412) 227-2032
Name of person interviewed Gregory Shamitko
Title Director of Environmental Affairs
Mailing address (if different from above) _____
Area code and telephone number (412) 684-1009 (G. Shamitko)

1. Current waste handling method:

- a. ☐ On-site ☐ treatment, ☐ storage, ☐ disposal ☐ PBR
b. ☒ On-site ☐ use, ☐ reuse, ☒ recycle, ☐ reclaim
c. ☒ Off-site ☐ treatment, ☐ storage, ☒ disposal
d. ☐ Off-site ☐ use, ☐ reuse, ☐ recycle, ☐ reclaim

2. Amount of hazardous waste produced:

- a. _____ kg./mo.
b. 0.45 tons K082 in 1995 kg./yr.

3. Types of hazardous waste produced by Hazardous Waste Number and destination facility (include location and type).

Waste Number	Destination Facility	Location and Type
K082	LWD, Inc KYD 088 438 817	Calvert City, KY 42029
D002, D008, D009, D010	" " "	" " "

4. Source Reduction: ☐ accomplished, ☐ proposed, ☐ not proposed

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

HAZARDOUS WASTE INSPECTION REPORT
GENERATORS - PART B

Site Name Koppers Messer Cake Photo ID Number PAF 982 577 082 Date 11 Dec. 1995

Hazardous Waste Inspection Report
Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
X				Hazardous waste determination, performed on all waste streams	262.11	H001
X				Identification number	262.12	H002
X				Hazardous waste shipments offered only to licensed transporters	262.12(d)	H003
	X			Authorization received from TSD facility for wastes shipped off-site within PA	262.13	H004
	X			PA manifest used for intrastate shipments	262.20(b)	H005
X				TSD state manifest or PA manifest used for out-of-state shipments	262.20(c)	H006
X				Manifests filled out properly and completely	262.20(g)	H007
X				Manifests routed properly and within time limits (7 days)	262.23(e)(f)	H008
X				Proper U.S. DOT shipping containers or packages being used	262.30(1)	H009
X				Shipping containers marked and labeled according according to U.S. DOT	262.30(2)	H010
		X		Containers of 110 gal. or less permanently marked with required hazardous waste label <i>refer 261.3(g)</i>	262.30(3)	H011
		X		Placards offered to transporter	262.33	H012
		X		Waste in containers or tanks accumulated on-site for less than 90 days	262.34(a)(1)	H013
		X		Wastes placed in containers properly marked and labeled or in tanks meeting requirements of Chapter 265, Subchapter J	262.34(a)(2)	H014
			X	Containers managed in accordance with Chapter 265, Subchapter I (any non-compliance for Subchapter I requirements is a violation of 262.34(a)(3))	262.34(a)(3)	H015
X				a). All containers of haz. waste in good condition	265.171	H016
X				b). Containers compatible with hazardous waste being stored within	265.172	H017
X				c). Containers of hazardous waste kept closed	265.173(a)	H018
X				d). Containers of hazardous waste are managed to prevent leaks	265.173(b)	H019
X				e). Containers of hazardous waste labelled to accurately identify contents	265.173(c)	H020
		X		f). Haz. waste accumulation areas inspected at least weekly	265.174	H021
X				g). Special requirements for ignitable, reactive and incompatible waste being met	265.176 - .177	H022
			X	h). Proper containment and collection system(s)	265.178	H023
X				Containers clearly marked with accumulation date and visible for inspection	262.34(a)(4)	H024
X				On the job or classroom personnel training program as per 265.16	262.34(a)(5)	H025

Hazardous Waste Inspection Report

Generators - Part B

1-No Violation Observed 2-Not-Applicable 3-Not-Determined 4-Non-Compliance

STATUS				REQUIREMENT	CHAPTER CITATION	LINE ITEM
1	2	3	4			
		X		Records retained at designated location for 20 years	262.40(a)	H026
		X		Quarterly reports submitted to the Department	262.41(a)	H027
	X			Exception reporting procedures followed	262.42	H028
	X			Hazardous waste disposal plan, if required	262.45	H029
	X			Spill reporting procedures followed	262.46(a)	H030
X				Preparedness, Prevention and Contingency Plan developed and implemented in accordance with Chapters 264 and 265	262.46(e)	H031
	X			Special requirements followed for international shipments	262.50, .53, .55, .60	H032
		X		Source reduction strategy prepared and available	262.80	H033

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11 December 1995 Identification Number PAD 982577082

Company/Facility/Site Name Koppers Industries, Inc. Monrozier Coke Plant

Follow up inspection to site visit from 19 Sept. 1995 conducted with Greg Shamitko, director of environmental affairs. Production of coke started in late October/early November and remains in a "start-up" mode while problems in the process are being identified and corrected. Hazardous waste generated on site is currently limited to contaminated soils from spilled wastes (ie KOS?). The last shipment of KOS? occurred on 12/1/95. Currently, the storage pile of excavated soil from the area of the ammonia liquor storage tank is the only contaminated soil that needs a waste determination performed. This soil had visible evidence of tar contamination and should be separately stored and analyzed from other excavated soils. ~~Other~~

Other wastes on site include 13, 55 gal. drums of contaminated soil generated from the clean up of spilled sulfuric acid (mid-October). These drums should be handled as hazardous waste until the waste determination has been completed. This includes labeling and containment. The newly constructed containment pad for KOS? hoppers at the AKJ plant contained three hoppers (110 gal.) and one rectangular container. One hopper contained contaminated KOS? (ie wood concrete) and should not be recycled. The rectangular container contents were not identified.

The waste oil tank (formerly known as "muck oil" tank) is to be recycled back onto the coal (for bulk density purposes). Waste oils generated in the machine shop are reported to be stored in a waste oil tank near the AKJ plant. This tank was empty and unlabeled; if this is a waste oil tank it should be labeled as such.

One other ~~waste~~ was observed on site needing containment. A container on the outside of the ammonium sulfate building was positioned to

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Person interviewed (signature) _____ Date _____

Inspector (signature) _____ Date _____

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL RESOURCES
BUREAU OF WASTE MANAGEMENT

INSPECTION REPORT COMMENTS

Date of Inspection 11 December 1995 Identification Number PAD 982 517 082Company/Facility/Site Name Koppers Industries, Inc. Manassas Coke Plant

collect a liquid naphthalene waste. Some of this liquid was observed to have splashed onto the ground. Containment should be constructed to prevent this or a system that eliminates the need for a collection hopper should be instituted.

Violations from Sept. 19, 1995 inspection that have been corrected include (1) removal and clean up of wastes (KOS?) stored next to the old dorr thickener.

(2) Containment for hazardous waste sludge (i.e. KOS?) has been constructed next to the AKI plant. Additional storage may be necessary.

(3) Training of employees has been accomplished (October 1995). Ongoing training of new employees should be prioritized.

Only item on non compliance from this inspection was previously noted (i.e. containment of naphthalene liquid waste at ammonium sulfate building).

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Person interviewed (signature) MarkedDate 30 December 1995Inspector (signature) David L. LeibDate 30 December 1995

Hazardous Waste Inspection Report
Land Disposal Restriction Supplemental Checklist

1-No Violation Observed					2-Not Applicable	3-Not Determined	4-Non-Compliance
Status					REQUIREMENT	Citation	
1	2	3	4	40 CFR Part 268			
					Generators		
X					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
X					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
X					Dilution not used as a substitute for treatment.	3	
X					Records maintained of notifications, certifications, waste analysis, and documentation supporting use of knowledge for waste classification.	7(a)(5), (a)(6)	
					Storage Facilities		
					Facility verifies generators classification of waste in accordance with waste analysis plan.	25 Pa Code 265.13(c)	
					Containers marked to identify contents and accumulation date.	50(a)(2)	
					Notification sent with shipments of wastes that do not meet treatment standards.	7(a)(1)	
					Notification and certification sent with shipments of wastes meeting treatment standards.	7(a)(2)	
					Facility maintains records of documents produced pursuant to LDR requirements.	7(a)(6)	
					Treatment Facilities, including PBR and RRR Facilities		
					Dilution not used as a substitute for treatment.	3	
					Facility tests wastes or treatment residues to determine compliance with applicable treatment standards in accordance with waste analysis plan.	7(b)	
					Certification and/or notification sent with shipments of waste.	7(b)(4), (b)(5), (b)(6)	
					Land Disposal Facilities		
					Facility tests wastes received to assure compliance with applicable treatment standards.	7(c)(2)	
					Facility land disposes of restricted waste only if it meets applicable treatment standard.	40	
					Facility retains copies of generator notifications and certifications.	7(c)(1)	